UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
726 MINNESOTA AVENUE
KANSAS CITY, KANSAS 66101

JUN 14 1991

MEMORANDUM

SUBJECT: COMMENTS ON THE PROPOSED PLAN FOR THE MARTHA C. ROSE CHEMICAL, INC. SITE

FROM: Michael J. Sanderson for
Chief, RCRA Branch

TO: Robert L. Morby
Chief, SPFD Branch

The following are our comments on the above reference Plan.

1. A possible exposure pathway was not addressed. The unnamed stream beside the facility has been identified as not having fish. During Spring breeding seasons many intermittent streams are used for fish breeding. These streams have seasonal population of food species, such as aquatic invertebrates, or year round populations of invertebrates that retreat to the sub-surface during the dry periods. PCBs are known to be accumulated by these species. Fish consuming these PCB contaminated invertebrates would bio-accumulate the PCBs and some of the VOCs. These fish could then carry the PCBs back to the main stream system and themselves become part of the food chain which could eventually lead to human exposure. This pathway may not exceed the 10^{-6} risk level, but it should be considered during the risk assessment.

2. See Paragraph 1, next to last sentence on page 4. Is there a degreasing pit at the South Warehouse? Are you referring to the pit in the Main Building?

3. Are the shallow and deep aquifer connected?

4. See Paragraph 1 on page 8, near the middle. The statement that the forth sampling incident confirmed dust contamination is too strong. The data strongly supports the finding, but does not confirm the finding.

5. The document addresses 10 years of groundwater monitoring. What evidence supports the finding that ten years is the appropriate sampling period?

6. What is the leachability of the concrete containing less than 2500 ppm? Is there a potential for release into the landfill that could cause future problems?

7. The document discusses significant amounts greater than 100 ppm for soil? Is there a numerical range defining 'significant'.

If you have any questions, please contact Ruben McCullers, of my staff, at 551-7455.